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FHWA-97-2199-12

Office of the Chief Counsel, Room 4232 HCC-10
Federal Highway Administration
400 7th Street SW
Washington, D.C. 20590

RE: **FHWA Docket #MC-93-12**

Dear Sir:

Enclosed find our thoughts on this proposal.

A. ADEQUACY OF TRAINING

1. **How can the adequacy of training be defined, and what mechanisms exist to measure adequacy?** At best the adequacy of training is a "hit or miss" proposition. If a carrier is lucky some training school graduates are okay, but most still are not! Many of the "fast buck" training schools are gone — but many of the schools that are left still do not train along any standard guidelines. The only mechanism to measure adequacy is for the motor carrier doing the hiring to conduct testing and keep statistical data.
2. **What standards exist to ensure that training provided by schools and employees is adequate for entry-level driver training?** The Professional Truck Driver Institute of America (PTDIA) headquartered in Elk Grove, California has developed standards modeled along the lines of your own FHWA model curriculum.
3. **What should an adequate truck driver training program include? What is the minimum amount of time or number of hours?** The PTDIA summary outline is well known and I'm sure your agency is familiar with it. Most programs fall short on the actual behind-the-wheel. Forty-four hours are minimum and can't be compromised.
4. **Can governmental or private standards that guide the training be used to determine the adequacy of entry level training? Why are such standards appropriate?** Our company has required seven contract training school partners to be PTDIA certified for the past one year. We had to "drag them screaming and kicking through the door". There was no uniformity prior to this and we could not live with the variation in the finished graduates. Rejection rates have late dropped accident rates dropped significantly.

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5. To obtain a CDL, a driver must demonstrate knowledge and skills necessary to operate a CMV. Do these tests measure a driver's performance? Comment on the deficiencies. There is too much variance when 50 states do the testing. Some allow third-party testers. Some programs train people only to pass — the “graduate” knows nothing else. Loaded trailers are not utilized. These tests are not comprehensive. A sixteen year old kid can pass a driver's exam-does this mean he can drive a cab in lower Manhattan?

6. Should training requirements be federally mandated? Unfortunately this is the only way those conducting training will upgrade their programs. It shouldn't be necessary but most people are simply too short sighted to see the benefits. How else can motor carriers be sure they are getting well trained people?

B. NUMBER OF DRIVERS TRAINED

7. What is an entry level OMV driver? Someone who has never been licensed to drive a commercial vehicle and is now ready to run with an experienced co-driver, who can function as an on-the-job instructor for a period of at least 30,000 miles.

8. What industry-wide initiatives or policies reasonably assure that the majority of all entry level drivers are trained. PDTIA could — but unfortunately there are none that assure they are trained.

9. How many truck driver training schools and motor carrier programs train entry-level drivers? What percentage of those enrolled successfully complete such training? The number of driver training schools declined dramatically when federal training funds dried up. Only a very small percentage of motor carriers operate their own schools that train totally inexperienced drivers from “scratch”. No one keeps the data requested for this question. Some schools graduate everyone who pays. Most are hired because of the critical shortage of drivers regardless of how much they learned.

10. Is the successful completion of an entry-level CMV driver training program a requirement for drivers hired by your company? Yes, but this does not guarantee that these people are adequately trained. The quality varies widely without any kind of standard in place.

11. Describe the training opportunities available for drivers of smaller trucking companies and owner/operators. What percentage of those enrolled complete training? Small companies and owner-operators have access to all drivers not trained as part of a contract group specially trained for a carrier. The fact is smaller companies and owner-operators pick off newly experienced drivers after they gain six months or so experience at a larger company. We become the source of drivers for others.

C. ENTRY-LEVEL DRIVER TRAINING COST/BENEFITS

12. Describe the expected benefits and estimated dollar costs for the following types of training:

A. Resident training at public and private schools including vo-tech and community college programs. Our company provides this type of training at seven such schools. The cost is \$2,550.00 per student (This is a four week program).

3. Home study in combination with hands-on behind the wheel training. No idea — we wouldn't accept this as a method of training.

C. Training by motor carriers through a formal school setting and on-the-job training. We don't actually know but we are seriously considering this option because we are dissatisfied with the quality of the training in our seven contract training programs.

D. Externships. We use this method. This places a greater burden on our lead drivers because the people are even worse who come from schools that we don't have a formal agreement with. This does lower cost to \$500.

E. Other considerations — Describe the type and frequency of training offered for experienced CMV drivers in our company. Is this required at specific intervals? We require all experienced drivers to be re-certified annually. This is a two-day program with a formalized curriculum. This covers every aspect of the driving job. Anyone who is involved in a sufficient number of errors or mistakes is required to take a company refresher course. We operate our own training center with a staff of 15 people.

Sincerely,



Don D. Lacy
Vice President Safety & Driver Resources

DDL:mm

cc: John Smith-CRST, Inc.
Ian Lamphier-CRST, Inc.
Bob Rothstein-ITCC